

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2018-42-E

In the Matter of:)	
)	
)	
South Carolina Electric & Gas Company's 2018)	
Annual Update on Demand Side Management)	PETITION TO INTERVENE
Programs and Petition to Update Rate Rider)	
)	

The South Carolina Coastal Conservation League and Southern Alliance for Clean Energy (collectively, "Petitioners") hereby petition the South Carolina Public Service Commission ("Commission") to intervene in the above-captioned docket pursuant to R. 103-825 of the Commission's rules. In support of this petition, Petitioners state as follows:

1. On January 30, 2018, South Carolina Electric & Gas Company ("SCE&G") filed an Annual Update on Demand Side Management Programs and Petition to Update Rate Rider. In its filing, SCE&G (i) submits information concerning the status of its demand reduction and energy efficiency (together, Demand Side Management or "DSM") programs for the Commission's review; and (ii) petitions the Commission for authorization to update its "Rider to Retail Rates – Demand Side Management Component" to provide for the recovery of SCE&G's costs, net lost revenues, and shared savings incentive associated with its DSM programs. SCE&G requests that the updated rider become effective for bills rendered on and after the first billing cycle of May 2018.

2. The South Carolina Coastal Conservation League ("CCL") is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. As an advocate for conservation and

energy efficiency, CCL and its members support the development of energy policy that is in the public interest of South Carolinians and promotes energy savings. CCL has members in South Carolina who receive electricity service from SCE&G and are subject to the impacts of SCE&G's DSM programs and rider. CCL participates in the SCE&G DSM advisory group process established in Docket No. 2009-261-E.

3. Southern Alliance for Clean Energy ("SACE") is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina. SACE has members who receive electricity service from SCE&G and are subject to the impacts of SCE&G's DSM programs and rider. SACE and its members are interested in promoting greater reliance on DSM to meet South Carolina's energy needs.

4. Petitioners have participated in prior SCE&G annual DSM update and rider dockets (CCL participated in Docket Nos. 2011-49-E, 2012-55-E, 2013-50-E, 2014-44-E, 2015-45-E, 2016-40-E, and 2017-35-E; SACE participated in Docket Nos. 2012-55-E, 2013-50-E, 2014-44-E, 2015-45-E, 2016-40-E, and 2017-35-E), as well as Docket No. 2013-208-E, in which SCE&G's current DSM cost recovery and incentive mechanism was established. Petitioners seek to intervene in this proceeding to ensure that their members' interests in promoting energy savings through DSM are represented.

5. Petitioners do not seek a hearing in this proceeding. Petitioners understand that written comments on the Company's petition are due before April 2, 2018 and plan to present their position in the form of written comments to be filed by this deadline. Should a public

hearing be scheduled in this docket, Petitioners seek to reserve the right to participate as a party of record.

6. Petitioners are represented by the following counsel in this proceeding:

Elizabeth Jones
Southern Environmental Law Center
463 King Street, Suite B
Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039
ejones@selcsc.org

WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 1st day of March, 2018.

s/ Elizabeth Jones
SC Bar No. 102748
Southern Environmental Law Center
463 King Street, Suite B
Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039

*Attorney for Petitioners South Carolina Coastal
Conservation League and Southern Alliance for
Clean Energy*

CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail and/or Electronic Mail with a copy of the Petition to Intervene of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

Matthew W. Gissendanner
South Carolina Electric & Gas Company/SCANA Corporation
MC C222
220 Operation Way
Cayce, SC 29033-3701
Matthew.gissendanner@scana.com

Andrew M. Bateman
Jenny Pittman
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
shudson@regstaff.sc.gov
abateman@regstaff.sc.gov

Stephanie U. Eaton
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
seaton@spilmanlaw.com

Lara R. Brandfass
Spilman Thomas & Battle, PLLC
300 Kanawha Boulevard, East
Charleston, WV 23501
seaton@spilmanlaw.com
lbrandfass@spilmanlaw.com

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

This 1st day of March, 2018.

s/ Anna M. Crowder